



The Marbury Building
6225 Smith Avenue, Suite 200B
Baltimore, MD 21209

T: 410.554.3600 F: 410.554.3636

nusinovsmith.com

Norman L. Smith
Partner

Writer's Direct Telephone:
(410) 554-3602

Writer's E-mail Address:
nsmith@nusinovsmith.com

December 12, 2017

Hon. Ellen L. Hollander
District Judge
United States District Court
Chambers 5B
101 West Lombard St.
Baltimore, MD 21201

Re: *Clancy v. Jack Ryan Enterprises, Ltd., et al.*
Case No. 17-cv-03371-ELH

Dear Judge Hollander:

We are the attorneys for Plaintiff/Counter-Defendant Alexandra M. Clancy. At the Court's direction, we filed yesterday a Memorandum addressing the Court's subject matter jurisdiction. In view of the Jurisdictional Memoranda filed by all parties, we will not file a motion to remand. Should the Court determine that federal jurisdiction exists in this matter, (1) the Plaintiff will not raise as a reason for remand, the timeliness of the Notice of Removal filed by Defendants Jack Ryan Enterprises, Ltd. ("JREL") and Jack Ryan Limited Partnership ("JRLP"), and (2) the Plaintiff will join with the Defendants in requesting that the Court exercise its supplemental jurisdiction over the contract claims stated in the Plaintiff's Complaint and in the Defendants' Counterclaims. As stated by the JREL/JRLP Defendants in Paragraph 10 of the Notice of Removal, the state law claims are inexorably intertwined with the federal claims asserted in the Counterclaim.

Today, the Plaintiff is filing an Answer to the Defendant J.W. Thompson Webb's Counterclaim, which was filed earlier in state court. At that time, counsel for Mr. Webb agreed to an extension of time for the filing of the Answer. With this filing, the issue will have been joined by all parties.

Respectfully submitted,

Norman L. Smith

cc: Jerrold A. Thrope, Esquire
Robert S. Brennen, Esquire
Lansing R. Palmer, Esquire